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March 3, 2022

The Honorable Pamela K. Chen
United States District Court
Eastern District of New York
Brooklyn, New York

Re: USA v. Kuang Ze Bin
1:21CR-00265 PKC

Dear Judge Chen:

Please be advised that I am seeking a **Modification of the Bond Conditions** for Kuang Ze Bin so that he can accompany his mother to visit his father's grave. His father died a year ago.

The defendant therefore requests that his travel conditions be modified to permit him to travel to and from his father's gravesite in New Jersey on an as-needed basis no more than once per month, provided that the specific day and time are provided to Pretrial three days in advance and subject to Pretrial's approval. The gravesite location has been provided to Pretrial Services and the government.

I have spoken with AUSA Matthew Haggans and he has indicated that the Government did not oppose the request for the modification of his bond condition. Pretrial Officer Bianca Carter was also contacted, and she also has no opposition

Very truly yours,



Michael D. Walsh